

EXHIBIT 19

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 COMMONWEALTH OF MASSACHUSETTS
 Middlesex, ss. Superior Court Department
 of the Trial Court
 No. 00-6030

CAROL A. STARKWEATHER, *

Plaintiff, *

*

vs. *

*

ACandS, INC., et al, *

Defendants. *

 DEPOSITION OF DR. WILLIAM E. LONGO, a
 witness called on behalf of the Defendants, taken
 pursuant to the applicable provisions of the

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<p style="text-align: center;">Page 149</p> <p>1 MR. SHEPARD: Objection. 2 A. Well, when you say that they typically 3 wore, it would be my opinion that they typically 4 did not wear those types, and if they did, it was 5 usually along the lines of those 3M paper masks, 6 but I haven't run across that many individuals 7 that actually said they wore masks. 8 Q. Have you seen any papers -- strike 9 that. 10 Other than paper masks, are there any 11 other types of respirators that you're familiar 12 with that painters wore in the '70s while they 13 were using simulated ceiling acoustics? 14 MR. SHEPARD: Objection. 15 A. Not that I'm aware of. 16 Q. I'm sorry, I have to go over a few 17 questions. 18 A. That's fine. 19 Q. Have you ever visited any of the work 20 sites that Mr. Belisle testified he worked at? 21 A. Not that I'm aware of. I don't believe 22 so. 23 Q. Have you ever been to L Street Station? 24 A. No.</p>	<p style="text-align: center;">Page 150</p> <p>1 Q. Have you ever seen plans of any of the 2 work sites that Mr. Belisle worked at? 3 A. No. 4 Q. What types of buildings did Mr. Belisle 5 work at? 6 A. Schools, commercial, power plants, 7 chemical plants, heavy industry, commercial 8 office type buildings. A wide range of buildings 9 over his years. 10 Q. Have you ever visited a power plant in 11 Massachusetts? 12 A. I have not. 13 Q. Have you ever seen any photographs of 14 the power plants in Massachusetts? 15 A. No. 16 Q. Have you ever done any dust sampling in 17 a power plant? 18 MR. SHEPARD: In Massachusetts or 19 anywhere? 20 MS. CREEDON: Anywhere. 21 A. Possibly. 22 Q. Where did you possibly do that? 23 MR. SHEPARD: Objection. Asked and 24 answered.</p>
<p style="text-align: center;">Page 151</p> <p>1 A. Again, I was in two cases in this 2 state. The City of Boston versus all the 3 asbestos manufacturers, and the State of 4 Massachusetts versus all the asbestos 5 manufacturers, and both of those cases we did 6 bulk sampling and dust sampling. 7 Now, I can't tell you what those 8 results are or where or et cetera, but I have no 9 intention of relying on those, but if I were to 10 pull all those files out from bygone years, there 11 probably would be some of that data in there. 12 Maybe not, I just don't know. 13 Q. With respect to L Street Station, do 14 you know the dimensions of L Street Station? 15 A. I would estimate a couple hundred yards 16 long, looks like 20 stories tall. 17 Q. Do you know what kind of ventilation it 18 has? 19 A. I can't see it from here, so the answer 20 is no. 21 Q. Do you know which portion of L Street 22 Mr. Belisle worked in? 23 A. No, I do not. 24 Q. Would you agree that various asbestos-</p>	<p style="text-align: center;">Page 152</p> <p>1 containing products cause different releases of 2 fiber? 3 A. Maybe, and that would depend on what 4 you did to them. 5 Q. Are you relying on any studies that 6 attempt to quantify asbestos exposure with 7 respect to painters? 8 A. Well, I guess, yes. I mean, you have 9 published literature of what happens when 10 somebody sands spackling and joint compounds, and 11 certainly as a painter, certainly Mr. Belisle 12 talked about having to sand spackling and joint 13 compounds. 14 Selikoff's work did quantify those 15 studies and those types of activities, and those 16 are very good examples because they're real world 17 studies. 18 Q. Do you remember the title of Selikoff's 19 study? 20 A. I think it's entitled The Sanding of 21 Patching and Joint Compounds, I believe. It was 22 in the Journal of Science, 1974. I don't 23 remember the lead author, but Selikoff was on the 24 tail end.</p>

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<p>1 Q. Is that an epidemiological study? 2 A. No. Well, hold on. I think there was 3 some of that in there, but most of it was actual 4 field measurements of individuals using these 5 products.</p> <p>6 Q. Are you relying on any epidemiological 7 studies in the Belisle case?</p> <p>8 A. No, that's not my area.</p> <p>9 Q. The last time you testified in 10 Massachusetts you testified that you were not an 11 industrial hygienist. Is that true today?</p> <p>12 A. I don't believe I've ever said that.</p> <p>13 Q. You are not -- you don't have a degree 14 in industrial hygiene; is that accurate?</p> <p>15 A. I do not have a degree in industrial 16 hygiene, and I am not a certified industrial 17 hygienist.</p> <p>18 Q. Have you ever reviewed any materials 19 regarding a product called Bloc-tex?</p> <p>20 A. I know that product.</p> <p>21 Q. What is that product?</p> <p>22 A. As I recall, it's a sealer for 23 concrete, concrete blocks, concrete walls. It's 24 a paint-type material that does have asbestos in</p>	<p>1 it. 2 Q. Who makes it? 3 A. I think your client does, or used to. 4 Q. Do you know how much asbestos it 5 contains? 6 A. That I can't recall. 7 Q. Have you ever tested that product? 8 A. I have not. 9 Q. Have you ever seen any studies of 10 anyone else testing that product? 11 A. No, I have not. 12 Q. You'll agree that your demonstrations 13 do not replicate the workplace? 14 A. I agree. 15 MS. CREEDON: That's all the questions 16 I have for you today. 17 THE WITNESS: Thank you. 18 ***** 19 EXAMINATION BY MR. GOVERNO: 20 Q. My name is David Governo. I represent 21 Terex, American Crane, and Koerhing. 22 You talked about a 1995, 1996 Report to 23 Congress on secondary exposures? 24 A. Yes.</p>
<p>Page 155</p> <p>1 Q. And you said that included a good 2 review of literature on secondary exposures, 3 including secondary exposure to asbestos? 4 A. Yes, sir. 5 Q. When was the first piece of literature 6 cited in that actually published? 7 A. 1961 or 2. 8 Q. Are you familiar with the asbestos 9 content of cosmetics? 10 A. In my field I have -- it's sort of like 11 an urban legend about the talcs in cosmetics 12 containing tremolite. I've never been able to 13 verify that. 14 * Q. Have you looked for studies reporting 15 on asbestos contamination of talc and other 16 ingredients of cosmetics? 17 A. Well, I'm certainly very familiar with 18 the asbestos contamination of talc, but what 19 we've seen -- now, I have seen inference to it 20 and I have seen studies on talc, and we have done 21 our own studies on talc, but what I haven't been 22 able to do is find a cosmetic where I can say, 23 yes, that has asbestos in it. Tremolite. 24 MR. GOVERNO: Can you read my question</p>	<p>Page 156</p> <p>1 back, please. 2 (* Question read back) 3 A. I have looked for all studies on 4 contamination of talc involving tremolite. I 5 have not seen one with cosmetics. 6 MR. GOVERNO: No further questions. 7 ***** 8 EXAMINATION BY MR. GRIECO: 9 Q. My name is Dennis Grieco. I have a few 10 questions for you. I'll be brief. I have just a 11 couple of fill-in questions. 12 A. Sure. 13 Q. We talked about studies and videos and 14 I think I have an idea of where the two shall 15 meet, so to speak, but let me see if I can go 16 over it with you. 17 First, you recall that you were deposed 18 here in Massachusetts in that Ondik case in 19 January of 2001? 20 A. I recall I was here. 21 Q. Okay. I'm going to represent to you 22 that it was in January of 2001. 23 A. I have no reason to dispute that. 24 Q. What specific studies have you or your</p>

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<p>1 firm performed since that date?</p> <p>2 A. Since January of 2001, as I mentioned</p> <p>3 earlier, we have done additional friction studies</p> <p>4 pertaining to arc grinding of brake shoes. I</p> <p>5 believe we have done a friction study on sanding</p> <p>6 of brake shoes since that time. We have done</p> <p>7 gasket studies in May, a fairly big study, Gasket</p> <p>8 Studies IV and V.</p> <p>9 We have done -- oh, we have done a</p> <p>10 transite study, cutting transite panel. I left</p> <p>11 that one out earlier. I forgot about that one.</p> <p>12 We cut transite panels with a skill saw with a</p> <p>13 carbide blade. I know there's a couple others,</p> <p>14 but I apologize.</p> <p>15 Q. Of those that you just listed for me,</p> <p>16 and any others that you recall in answering this</p> <p>17 next question, which do you intend to or are you</p> <p>18 relying upon with respect to your testimony in</p> <p>19 the Starkweather case?</p> <p>20 A. There are no studies that were done</p> <p>21 after 2001, that I'm aware of, that I would be --</p> <p>22 excuse me, after January of 2001 that I would be</p> <p>23 relying on here.</p> <p>24 Q. Just so I can make sure I understand,</p>	<p>1 Doctor --</p> <p>2 A. Yes, sir.</p> <p>3 Q. -- focussing again on the studies that</p> <p>4 you will rely upon in the Starkweather case,</p> <p>5 those include the specific studies that were</p> <p>6 performed by others that you described for us</p> <p>7 concerning thermal insulation, correct?</p> <p>8 A. Yes, sir.</p> <p>9 Q. Your own studies performed by you or</p> <p>10 your company with respect to thermal insulation?</p> <p>11 A. That's correct.</p> <p>12 Q. With respect to insulation materials,</p> <p>13 other than thermal insulation in the Starkweather</p> <p>14 case, you intend to rely upon literature produced</p> <p>15 by Peter Harries in the mid '60s; is that right?</p> <p>16 A. That's one of the studies.</p> <p>17 Q. What are the others?</p> <p>18 A. Oh, on insulating cements?</p> <p>19 Q. Yes.</p> <p>20 A. I don't know of another one besides</p> <p>21 his.</p> <p>22 Q. And you also intend to rely upon your</p> <p>23 Secondary Exposure Studies II and III in the</p> <p>24 Starkweather case, correct?</p>
<p style="text-align: center;">Page 159</p> <p>1 A. That's correct.</p> <p>2 Q. And there are videos to those two</p> <p>3 studies?</p> <p>4 A. That's correct.</p> <p>5 Q. And there's also a video related to the</p> <p>6 thermal insulation study that you just mentioned,</p> <p>7 correct?</p> <p>8 A. That's correct.</p> <p>9 Q. And that is the full gamut of studies,</p> <p>10 literature, and/or videos that you intend to rely</p> <p>11 upon in the Starkweather case?</p> <p>12 A. Oh, no. Maybe I wasn't asked, but</p> <p>13 certainly I have a library of secondary exposure</p> <p>14 studies. As I was talking about earlier, the</p> <p>15 Report to Congress. If you want to look for one</p> <p>16 document that really is a good compilation of all</p> <p>17 the studies, that's a good one, the '95 Report to</p> <p>18 Congress.</p> <p>19 Q. Okay. Outside of that '95 Report to</p> <p>20 Congress and the studies and videos you just</p> <p>21 described for me, are there any other studies or</p> <p>22 literature that you intend to rely upon or are</p> <p>23 relying upon for your opinions in the</p> <p>24 Starkweather case?</p>	<p style="text-align: center;">Page 160</p> <p>1 A. Just to be clear, I think the answer is</p> <p>2 no, but to make sure of that, the references in</p> <p>3 that Report to Congress are all references that I</p> <p>4 have, but other than that, no, that's it.</p> <p>5 Q. And we've described all the videos or</p> <p>6 other graphic presentations that you intend to</p> <p>7 rely upon in the Starkweather case?</p> <p>8 A. Based on the information I have now,</p> <p>9 yes.</p> <p>10 Q. Okay. Now, turning specifically to</p> <p>11 your understanding of Mr. Byrnes' exposure, Mrs.</p> <p>12 Starkweather's father, am I correct in</p> <p>13 understanding that, as you sit here today, you</p> <p>14 don't know which, if any, work site his asbestos</p> <p>15 exposure took place at, but you know it was with</p> <p>16 respect to this dust cloud from ripping down the</p> <p>17 boiler that Mr. Riley mentioned; is that correct?</p> <p>18 MR. SHEPARD: Objection.</p> <p>19 MR. COSTELLO: Objection.</p> <p>20 A. No, not quite correct. I said that was</p> <p>21 probably one of the larger exposures, but it is</p> <p>22 my opinion that any time during that time frame</p> <p>23 working at any powerhouse you're going to have</p> <p>24 some exposure, even if you're outside, just</p>

